

**UNITED STATES DISTRICT COURT FOR**  
**THE DISTRICT OF MASSACHUSETTS**

**WENXIN KARSHIS,**  
**Plaintiff**

**vs**

**RHONDA K. SIMPER,**  
**Defendant**

**CIVIL ACTION NO. 04-10234 RGS**

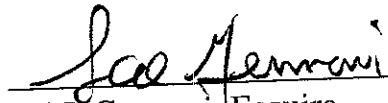
**JOINT STATEMENT**  
**PURSUANT TO LR 16.1**

The parties to the above-captioned action hereby submit the following proposed pre-trial schedule:

1. All discovery, including interrogatories, requests for production of documents, requests for admissions and depositions (excluding expert depositions), shall be completed on or before November 21, 2004.
2. The Plaintiff, Wenxin Karshis, shall be examined by an Independent Medical Doctor on or before November 21, 2004.
3. The parties shall supplement their expert interrogatories and file their expert disclosures pursuant to F.R.C.P. 26(a)(2)(B) on or before ninety (90) days before trial.
4. All expert depositions shall be completed within thirty (30) days prior to trial.
5. Any and all dispositive motions shall be filed on or before sixty (60) days prior to trial.

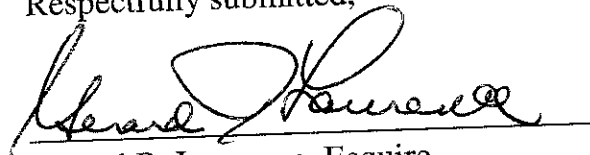
See attached Certifications relative to LR 16.1(D)(3).

Respectfully submitted,

A handwritten signature in cursive script, reading "Sal J. Germani", written over a horizontal line.

Sal J. Germani, Esquire  
BBO #547991  
Germani & Germani, P.C.  
50 Union Street, P. O. Box 2178  
Attleboro, MA 02703  
(508) 222-5858  
(508) 222-9906 Fax

Respectfully submitted,

A handwritten signature in cursive script, reading "Gerard R. Laurence", written over a horizontal line.

Gerard R. Laurence, Esquire  
BBO #288220  
Milton, Laurence & Dixon  
100 Front Street, Suite 1510  
Worcester, MA 01608  
(508) 791-6386  
(508) 799-4879 Fax

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

WENXIN KARSHIS

VS

CIVIL ACTION NO. 04-10234-RGS

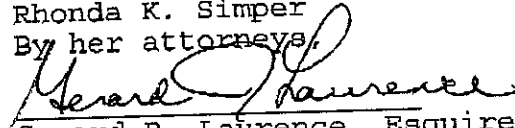
RHONDA K. SIMPER

CERTIFICATION  
L.R. 16.1 (D) (3)

We certify that Allstate Insurance Company, Insurer of Rhonda K. Simper, and its counsel at Milton, Laurence and Dixon have conferred to establish a budget for the full litigation of the above captioned matter, as well as a budget for the various alternatives.

Further, Allstate Insurance Company, Insurer of Rhonda K. Simper, and its counsel have discussed the resolution of the litigation through the use of Alternative Dispute Resolution programs and need to develop further information before deciding whether the case is appropriate for settlement, ADR or trial.

Respectfully submitted,  
Rhonda K. Simper  
By her attorneys,

  
Gerard R. Laurence, Esquire  
Milton, Laurence & Dixon  
100 Front Street, Suite 1510  
Worcester, MA 01608  
508-891-6386  
BBO # 288220

On behalf of the Defendant,  
Allstate Insurance Company,  
Insurer of Rhonda K. Simper

BY: 

RECEIVED  
ALLSTATE INSURANCE  
CT CASUALTY MCO  
MAR 25 2004

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MASSACHUSETTS**

WENXIN KARSHIS,  
Plaintiff

vs  
RHONDA K. SIMPER,  
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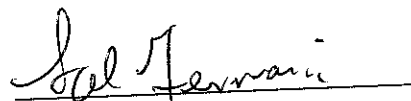
C. A. NO. 04-10234-RGS

**CERTIFICATION**  
**LR 16.1(D)(3)**

I certify that Wenxin Karshis, Plaintiff, and her counsel, Sal J. Germani, Esquire, have conferred to establish a budget for the full litigation of the above captioned matter, as well as a budget for the various alternatives.

Further, Wenxin Karshis, Plaintiff, and her counsel have discussed the resolution of the litigation through the use of Alternative Dispute Resolution programs and need to develop further information before deciding whether the case is appropriate for settlement, ADR or trial.

Respectfully submitted,  
The Plaintiff  
By her Attorney



Sal J. Germani, Esq.  
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50 Union Street  
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Attleboro, MA 02703